

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOLYAN RAEED ZAHRAH,

Defendant.

Case: 2:25-cr-20470
Assigned To : Hood, Denise Page
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 6/25/2025
Description: INDI USA v ZAHRAH (JP)

Violations:

18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)
18 U.S.C. § 48(a)(3)

INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. § 2252A(a)(2)
Distribution of Child Pornography

Between on or about January 3, 2025, and on or about January 4, 2025, in the Eastern District of Michigan, Southern Division, the defendant, Jolyan Raeed Zahrah, knowingly distributed child pornography, as defined in 18 U.S.C. § 2256(8), using a means and facility of interstate and foreign commerce; and the child pornography was mailed, shipped, and transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT TWO

18 U.S.C. § 2252A(a)(5)(B)

Possession of Child Pornography

On or about April 11, 2025, in the Eastern District of Michigan, Southern Division, the defendant, Jolyan Raeed Zahrah, knowingly possessed child pornography, the child pornography involved a prepubescent minor or a minor who had not attained 12 years of age, as defined in 18 U.S.C. § 2256(8)(A), which had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce and in and affecting foreign commerce, and the child pornography was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT THREE

18 U.S.C. § 48(a)(3)

Distribution of an Animal Crush Video

On or about September 23, 2024, in the Eastern District of Michigan, Southern Division, the defendant, Jolyan Raeed Zahrah, did unlawfully and knowingly sell, market, advertise, exchange, and distribute obscene depictions of animals being intentionally crushed, burned, drowned, suffocated, impaled, or otherwise subjected to serious bodily injury, that is, a video of an adult male penetrating a living kitten with his penis, in and using a means and facility of

interstate and foreign commerce, all in violation of Title 18, United States Code, Section 48(a)(3).

COUNT FOUR
18 U.S.C. § 48(a)(3)
Distribution of an Animal Crush Video

On or about December 29, 2024, in the Eastern District of Michigan, Southern Division, the defendant, Jolyan Raeed Zahrah, did unlawfully and knowingly sell, market, advertise, exchange, and distribute obscene depictions of animals being intentionally crushed, burned, drowned, suffocated, impaled, or otherwise subjected to serious bodily injury, that is, a video of an adult male penetrating a living frog with his penis, in and using a means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Section 48(a)(3).

FORFEITURE ALLEGATION

1. The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

2. If convicted of an offense charged and set forth above, Jolyan Raeed Zahrah shall forfeit to the United States:

- a. any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film,

videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. **Substitute Assets.** Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson

Grand Jury Foreperson

JEROME F. GORGON, JR.
United States Attorney

s/ Douglas C. Salzenstein

DOUGLAS C. SALZENSTEIN
Chief, Homeland Security Unit
Assistant United States Attorney

s/ Zachary A. Zurek

ZACHARY A. ZUREK
Assistant United States Attorney

Dated: June 25, 2025

Assigned To : Hood, Denise Page
 Referral Judge: Stafford, Elizabeth A.
 Assign. Date : 6/25/2025
 Description: INDI USA v ZAHRAH (JP)

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <i>ZAZ</i>

Case Title: USA v. JOLYAN RAEED ZAHRAH

County where offense occurred : Macomb

Check One: **Felony** **Misdemeanor** **Petty**

- Indictment/ Information --- no prior complaint.
 ✓ Indictment/ Information --- based upon prior complaint [Case number: 25-mj-30386]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 25, 2025

Date



Zachary A. Zurek
 Assistant United States Attorney
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 Attorney Bar #: P80116

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.